

**DEPARTMENT OF THE TREASURY
FEDERAL LAW ENFORCEMENT TRAINING CENTER
GLYNCO, GEORGIA 31524**

FLETC DIRECTIVE (FD)

NUMBER: 71-05.A

Subject:

DATE: 09/24/92

Sunset Review:

PROCEDURES FOR HANDLING AND INVENTORY
OF CONTROLLED SUBSTANCE

1. PURPOSE. This directive establishes procedures for the security, handling, and inventory of controlled substances used by the Federal Law Enforcement Training Center (FLETC) staff in the training of students.

2. SCOPE. The provisions of this directive apply to all the FLETC personnel involved in the handling of controlled substances as well as students participating in training activities relating to those substances. Controlled substances will not be kept at the Office of Artesia and Marana Operations (OAMO). Requests for training requiring use of controlled substances at OAMO will be handled on a case-by-case basis by the Director, OAMO; arrangements will be made for training support from local area law enforcement offices (e.g., the U.S. Customs Office in Tucson, Arizona) as required.

3. CANCELLATION. FLETC Directive No. 71-05.A, Procedures for Security, Handling, and Inventory of Controlled Substances, dated November 13, 1987, is superseded.

4. REFERENCE. 21 C.F.R. Parts 1301, 1304, 1305, and 1307.

5. DEFINITIONS.

a. Controlled Substances - those chemical compounds for which the manufacture, sale, importation, exportation, and use are subject to the provisions of the Controlled Substances Act of 1970.

b. Schedule I Substances - those chemical compounds which have no current accepted medical use in the United States; these substances have a high potential for abuse and lack of user manageability.

c. Schedule II Substances - those chemical compounds which have a high potential for abuse, are currently accepted for medical use in treatment in the United

States or for medical use with severe restrictions, and which may lead to severe psychological or physical dependence.

d. Schedule III Substances - those chemical compounds which have less potential for abuse than the drugs or substances in Schedules I and II, are currently accepted for medical use in treatment in the United States, and which, when abused, may lead to moderate or low physical dependence or high psychological dependence.

e. Schedule IV Substances - those chemical compounds which, relative to the drugs or other substances in Schedule III, have a lower potential for abuse, are currently accepted for medical use in treatment in the United States, and have less potential for producing dependence than Schedule III drugs.

f. Schedule V Substances - those chemical compounds which have a lower potential for abuse relative to the drugs or other substances in Schedule IV, have current accepted medical use in treatment in the United States, and have less potential for producing dependence than Schedule IV drugs.

g. Custodian - individual responsible for the security, handling, and inventory of bulk controlled substances and his/her own controlled substance kit. This individual will serve as the custodian for a period of two years.

h. Assistant Custodians - individuals designated to assist the custodian in maintaining proper accountability procedures for the security, handling, and inventory of controlled substances. Assistant custodians are responsible for proper accountability of individually assigned controlled substance kits.

6. POLICY. It is the policy of the FLETC that maximum security and accountability of controlled substances be maintained at all times. Toward this end, a custodian, and assistant custodians as required, will be designated as the individual(s) responsible for the security, storage, distribution, inventorying, and record-keeping of all controlled substances obtained and utilized by FLETC staff for training purposes.

7. RESPONSIBILITY FOR DESIGNATION. The Chief, Enforcement Techniques Division (ETD), will designate a custodian and assistant custodians to be responsible for controlled substances which are used for training purposes. The Chief, ETD, will furnish the names of the custodian and assistant custodians, in writing, to the Director, Office of General Training (OGT), and will notify that Office of any temporary or permanent changes in these designations.

8. SECURITY.

a. Storage. All FLETC controlled substances which are designated as training substances will be secured in the vault in Building 262, Room P-10. This vault will be used solely for the safekeeping of controlled substances. Inside the vault are three safes which are designated as follows:

(1) Safe #1 - 2' X 4'. This safe will contain the bulk controlled substances used to replenish the assistant custodians' kits, when needed, with controlled substances to perform laboratory exercises. Additionally, the custodian will store his/her individual controlled substance kit in this safe.

(2) Safes #2 and #3. Each safe consists of five drawers with individual combination locks. The combination of each drawer is set by an assistant custodian for personal access. If there is a change in an assistant custodian, the combination is changed. These safes will contain the controlled substance kits assigned to the assistant custodians.

b. Safe Combinations. The custodian will be the only person who has knowledge of the combination of safe #1. The assistant custodians will be individually responsible for their respective combinations. Each time there is a change of assistant custodian or custodian, the applicable safe combination shall be changed.

(1) The custodian and assistant custodians will make a personal copy of their respective combinations and place it in a sealed white envelope. In their presence, this envelope will be placed in a 5" X 7" brown envelope and sealed by the custodian.

The custodian will initial the back flap of the envelope and seal the back flap with scotch tape. This envelope will have the following on the face:

Custodian's Name

Date

Location of Drawer (e.g. Safe #2, Drawer A; Safe #3,
Drawer C, etc.)

(2) These envelopes will be secured in a safe in the Office of the Deputy Director, FLETC. Whenever the custodian or assistant custodian(s) change responsibilities for any reason, the applicable combination(s) will be changed immediately. The applicable combination(s) will also be changed in the event one of the envelopes maintained by the Deputy Director is opened.

(3) In an emergency, a safe may be opened with the approval of one of the following:

- (a) The Director or Deputy Director;
- (b) the Director, OGT; or
- (c) the Chief, ETD.

(4) The assistant custodian is the only person authorized access to that individually assigned safe drawer.

9. PROCEDURES FOR HANDLING

a. All FLETC controlled substances used for training purposes will be rigidly controlled by the custodian and the assistant custodian(s). They are the only individuals who will have knowledge of the combination to their safe drawer and possess a vault door key.

b. Each kit will contain a listing of all controlled substances that are in the kit. When the kits are used for laboratory training, the instructor will fill out the Instructor Inventory Control Sheet, FTC-OGT-62, (Attachment 1) which applies to the specific kit used. The custodian is the only individual authorized to transfer the controlled substances from bulk to individual kits. This transfer will be witnessed by the Assistant Chief, ETD, and the assistant custodian receiving the controlled substances.

c. Prior to entering the vault, the custodian or assistant custodian must notify the Security Police by telephone. It is recommended that the telephone call be placed from the phone installed in the scale room (P-10, Building 262). The custodian or assistant custodian must give name and personal identification number (PIN) to the Security Police prior to entering the vault. Once the Security Police authorize access, the custodian or assistant custodian may enter the vault.

d. Each time the vault is opened by the custodian or an assistant custodian(s), an entry will be recorded on the Drug Vault Log Sheet, FTC-OGT-65, (Attachment 2). The log will be located inside the vault and will reflect the date, purpose, and individual's name(s).

e. Controlled substances that are removed from the safe(s) will remain under the direct sight and control of one of the authorized individuals. These substances will be removed for the following reasons only:

- (1) Training purposes; or
- (2) inventory; or

(3) transfer or replenishment of the assistant custodians' controlled substance kits.

f. Controlled substances that are removed for classroom or laboratory use will be taken, via the most direct route, from the vault to the classroom or laboratory.

g. FLETC security procedures will comply with the provisions of §1301.71, §1301.75 and §1301.76 of 21 C.F.R. Part 1301 (Attachment 3).

10. INVENTORY.

a. An initial inventory will be conducted to comply with the provisions of §1304.12 of 21 C.F.R. Part 1304 (Attachment 4). A complete inventory of the controlled substances in each individual's controlled substance kit will be conducted whenever there is a change in custodian or assistant custodian. At a minimum, a semi-annual (April and October) inventory will be conducted of the substances in Safe #1 and of the substances in each assistant custodian's kit. In addition, a biennial inventory will be taken in accordance with the requirements of §1304.11, §1304.13 and §1304.19 of Attachment 4. More frequent inventories may be conducted at the discretion of the custodian or Chief, ETD. Present at these inventories will be:

(1) The custodian;
(2) the Assistant Chief, ETD; and
(3) a representative designated by the Deputy Director, FLETC, who will serve for a period of two years. This representative must meet the following criteria:

(a) Must not be the immediate supervisor of those instructors who handle the controlled substances, and
(b) must possess the requisite technical abilities and knowledge of the inventory process.

b. Any discrepancy must be reported immediately to the Chief, ETD, who will report to the Director, OGT. The Director, OGT, will receive all reports related to Narcotics Inventories from the Chief, ETD. The Director, OGT, will take appropriate action, as required, on any discrepancies found during these inventories and inform the Office of the Director of any inventory problems.

11. DISPOSAL. The regulations of the Drug Enforcement Administration (DEA) provide various options for the registrant to dispose of a controlled substance.

However, the preferred method of disposal for the FLETC will be destruction of the controlled substance in the presence of the Deputy Director's designee or Assistant

Division Chief, ETD, pursuant to §1307.21(b)(3) of 21 C.F.R. Part 1307 (Attachment 5). Before the controlled substances are destroyed, the custodian or assistant custodian will list the substances on DEA Form 41 and submit three copies of that form to the DEA Regional Administrator. Destruction of the substances will take place after authorization has been received from the Regional Administrator.

12. RECORDS. All records relating to the controlled substances used for training will be maintained by the Chief, ETD, and shall be available for inspection and copying for at least two years from the date the record was created or received by the FLETC. Further, these records shall comply with the requirements of §1304.21 and §1304.27 of Attachment 4.

13. PROCUREMENT. Procurement of controlled substances will be in accordance with applicable regulations and will be made with forms that are in compliance with 21 C.F.R. Part 1305 (Attachment 6).

14. OFFICE OF PRIMARY INTEREST. Enforcement Techniques Division,
Office of General Training.

Charles F. Rinkevich
Director

Attachments (6)